

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In Re:

Chapter 7

Joseph M. Bonilla, Jr. and Vilma Bonilla,

Case No. 816-70321-735

Debtor.

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Application in Support of Order Authorizing Retention
of Rosenberg & Gluck L.L.P. as Special Counsel for Trustee

The Application of Marc A. Pergament, Trustee of the above-referenced Estate, by his attorneys, Weinberg, Gross & Pergament LLP respectfully represents as follows:

1. On or about January 27, 2016, the Debtor herein filed a petition under Chapter 7 of the Bankruptcy Code. Marc A. Pergament was appointed Interim Trustee and duly qualified, and by operation of law, became the permanent Trustee.
2. Pursuant to Section 327(e) of the Bankruptcy Code and Local Rule 18, the Trustee has selected and, subject to this Court's approval, authorized the employment of Rosenberg & Gluck L.L.P. as his special counsel to represent him and assist him in the prosecution of a personal injury claim.
3. The Trustee has selected said attorneys because they have had extensive experience in personal injury matters, and the Trustee believes that said attorneys are well qualified to represent him in the prosecution of the personal injury claim.
4. The professional services which said attorneys are to render is the prosecution of a personal injury claim. The Debtor had retained Rosenberg & Gluck L.L.P. and the Trustee requests that it continue to pursue that claim.

5. To the best of the Trustee's knowledge, information and belief, Rosenberg & Gluck L.L.P. has no connection with the Debtor except noted, their creditors, the Trustee, or any other party in interest or their respective attorneys or accountants.

6. To the best of the Trustee's knowledge, information and belief, Rosenberg & Gluck L.L.P. does not hold or represent any interest adverse to the Debtor or their Estate and is a disinterested person under Section 101 of the Bankruptcy Code.

7. The Trustee desires to retain Rosenberg & Gluck L.L.P. under the same retainer that was signed by the Debtor. A copy of the retainer is annexed hereto as Exhibit "A."

8. The employment of Rosenberg & Gluck L.L.P. would be in the best interest of this Estate.

9. No previous application for the relief requested herein has been made in this or any other court.

WHEREFORE, the Trustee respectfully requests that he be authorized to employ and retain Rosenberg & Gluck L.L.P. as special counsel to represent him in the prosecution of a personal injury claim and that he have such other and further relief as to this Court may seem just.

Dated: Garden City, New York
March 10, 2016

Weinberg, Gross & Pergament LLP
Attorneys for Trustee

By: 

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